

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION

DEBTOR: SCOTT WILLIAMS JR. : Chapter 13  
SARA L. WILLIAMS :  
SS#: xxx-xx-2575 : Case No. 14-53102  
xxx-xx-0937

**NOTICE OF MOTION TO MODIFY PLAN AFTER CONFIRMATION**

THE ABOVE DEBTOR HAVING FILED PAPERS WITH THE COURT TO MODIFY THE PLAN AFTER CONFIRMATION.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.)**

IF YOU DO NOT WANT THE COURT TO ALLOW THE MOTION TO MODIFY THE PLAN AFTER CONFIRMATION, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE MOTION TO MODIFY THE PLAN AFTER CONFIRMATION, THEN YOU OR YOUR ATTORNEY MUST FILE WITH THE COURT A WRITTEN REQUEST FOR A HEARING ON OR BEFORE **MARCH 28, 2016**. IF AN OBJECTION IS FILED, A HEARING WILL BE HELD **APRIL 13, 2016** AT **9:30 AM** IN COURTROOM **B**, UNITED STATES BANKRUPTCY COURT, 433 CHERRY STREET, MACON, GA. 31201

IF YOU MAIL YOUR REQUEST TO THE COURT FOR FILING, YOU MUST MAIL IT EARLY ENOUGH SO THE COURT WILL RECEIVE IT ON OR BEFORE THE DATE STATED ABOVE.

ANY REQUEST FOR A HEARING MUST ALSO BE MAILED TO THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.

IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY ENTER AN ORDER GRANTING THAT RELIEF.

Dated this **2nd day of March, 2016.**

Alex D. Sanders  
Attorney for Debtor  
577 Mulberry Street, St. 1515  
Macon, Georgia 31201  
Phone: (478) 841-9467

Kyle George, Clerk  
United States Bankruptcy Court  
P.O. Box 1957  
Macon, Georgia 31202  
Phone: (478) 752-3506

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**MOTION FOR MODIFICATION/AMENDMENT**  
**AFTER CONFIRMATION**

COMES NOW, SCOTT WILLIAMS, JR. AND SARA L. WILLIAMS, and respectfully file this Modification/Amendment to their Chapter 13 Plan and respectfully show the court the following:

1.

Debtors assert that the Chapter 13 petition was filed on December 24, 2014, and the plan presented was confirmed on July 10, 2015.

2.

Debtors have had a change in circumstances. Debtor Sara L. Williams lost her job in June of 2014 after having to undergo a knee replacement. She received short term disability until September. The debtor received unemployment from October to January. She applied for Social Security Disability, but was denied. Debtors propose to make the following changes to the plan as heretofore filed.

3.

The debtors propose to make a change to section 2(d) of the plan. The debtors will decrease the monthly payment amount to World Omni Financial Corp. fka SE Toyota Finance to \$450.00 per month on the debt secured by a 2013 Toyota Camry.

4.

The debtors propose to make two changes to section 2(e) of the plan. The debtors will decrease the monthly payment amount to Ally Financial \$290.00 per month on the debt secured by a 2012 GMC Sierra. Additionally, the debtors propose to decrease the monthly payment amount to Badcock to \$30.00 per month on the debt secured by a 2013 Toyota Camry.

5.

The debtors propose to eliminate the disposable income dividend under section 2[n(i)] of the plan.

6.

The plan payment will decrease to \$402.00 weekly. The debtor will make payments for 57 months and anticipate a dividend of 27%.

7.

After notice and opportunity for objections, the Plan as modified/amended should become the Debtor's Plan.

**WHEREFORE**, the Debtor prays that the Motion for Modification/Amendment of the Chapter 13 be approved.

This day **2nd** day of **March, 2016.**

577 Mulberry Street, Ste. 1515  
Macon, GA. 31201  
Phone (478) 841-9467  
asanders@kelleylovett.com

/s/ Alex D. Sanders  
Kelley, Lovett & Blakey, P.C.  
Attorney for Debtor  
Ga. State Bar No. 081012

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CERTIFICATE OF SERVICE

I, Alex D. Sanders, certify that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on the 2nd day of March, 2016 I served a copy of the within Notice and Motion for Modification After Confirmation by electronic notice to Camille Hope, Chapter 13 Trustee, and to all parties on the creditors matrix by depositing a copy of same in the United States Mail in a properly addressed envelope with adequate postage to insure delivery:

This 2nd day of March, 2016.

577 Mulberry Street, Ste. 1515  
Macon, Georgia 31201  
Phone: (478) 841-9467

/s/ Alex D. Sanders  
Alex D. Sanders  
Attorney for Debtor  
Ga. State Bar No. 081012

United States Attorney  
Attn: Barbara Parker  
Post Office Box 1702  
Macon, GA 31202

Elizabeth A. Hardy  
440 Martin Luther King Jr. Blvd.  
Room 302  
Macon, GA 31201

U.S. Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

Georgia Attorney General  
40 Capital Square SW  
Atlanta, GA 30334

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

U. S. Securities and Exchange Commission  
Atlanta Regional Office  
Reorganization Branch  
950 East Paces Ferry Rd NE., Ste. 900  
Atlanta, GA 30326-1382

#Georgia Dept. of Revenue  
Compliance Division  
ARCS-Bankruptcy  
1800 Century Blvd., NE, Suite 9100  
Atlanta, GA 30345-3205

Ally Financial  
P O Box 380901  
Bloomington, MN 55438-0901

Avant Credit  
640 N. LaSalle Drive  
Suite 535  
Chicago, IL 60654

Bank of America  
PO Box 982235  
El Paso, TX 79998-2235

Capital One  
Customer Service  
P.O. Box 30285  
Salt Lake City, UT 84130-0285

CFNA/Firestone  
P.O. Box 81315  
Cleveland, OH 44181-0315

CitiFinancial Bankruptcy Dept.  
PO Box 6043  
Sioux Falls, SD 57117

Cox Communications  
c/o Equidata  
PO Box 6610  
Newport News, VA 23606-0610

Credit Bureau Associates of Georgia  
420 College Street  
Macon, GA 31201

Credit One Bank  
P.O. Box 98873  
Las Vegas, NV 89193

Dell Financial Services  
c/o DFS Customer Care Dept.  
P. O. Box 81577  
Austin, TX 78708-1577

Dell Financial Services  
c/o DFS Customer Care Dept.  
P.O. Box 81577  
Austin, TX 78708-1577

Fingerhut  
Customer Service  
P.O. Box 1250  
Saint Cloud, MN 56395-1250

First National Credit Card  
Customer Service  
P.O. Box 5097  
Sioux Falls, SD 57117-5097

First Premier Bank  
P. O. Box 5524  
Sioux Falls, SD 57117-5524

Forsyth Street Orthopaedics  
1600 Forsyth Street  
Macon, GA 31201-1408

George S. Stefanis, MD  
310 Hospital Drive  
Suite 205  
Macon, GA 31217

Guardian Protection Services  
174 Thorn Hill Road  
Warrendale, PA 15086

Helzberg Private Account  
PO Box 4499  
Beaverton, OR 97076

Home Depot Credit Services  
P. O. Box 790328  
Saint Louis, MO 63179

J Franklin Auto Sales  
2558 Riverside Drive  
Macon, GA 31204

Javoris Williams  
4254 Roy Avenue  
Macon, GA 31206

Kay Jewelers  
Billing Inquiries  
P. O. Box 1799  
Akron, OH 44309-1799

Kaybee of Macon  
446 Third Street  
Macon, GA 31201

MABT-Retail  
PO Box 4499  
Beaverton, OR 97076

Medical Center of Central Georgia  
2490 Riverside Drive  
Macon, GA 31204

Merrick Bank  
P. O. Box 9201  
Old Bethpage, NY 11804

Merrick Bank  
P. O. Box 5721  
Hicksville, NY 11802-5721

Microf  
PO Box 70085  
Albany, GA 31708

Northland Group Inc.  
PO Box 390846  
Edina, MN 55439

One Main Finacial  
1396 Gray Hwy  
Macon, GA 31211

One Main Financial  
1396 Gray Hwy  
Macon, GA 31211

Pioneer Credit  
PO Box 634  
Macon, GA 31201

Radiology Associates of Macon  
PO Box 1044  
Indianapolis, IN 46206-1044

Republic Finance, LLC  
3955 Arkwright Road  
Suite D  
Macon, GA 31210

Sears  
PO Box 6282  
Sioux Falls, SD 57117-6282

Sears Gold Mastercard  
c/o ERS  
PO Box 469100  
Escondido, CA 92046

Shop Now Pay Plan  
CREDIT DEPARTMENT  
P. O. Box 2852  
Monroe, WI 53566-8052

Southeast Toyota Finance  
P O Box 991817  
Mobile, AL 36691-8817

Southeastern Pathology  
c/o SCA Collections  
300 E Arlington Blvd  
Suite 6-A  
Greenville, NC 27858

Southern Finance  
3755 Bloomfield Road  
Suite 3  
Macon, GA 31206

SYNCB/Belk  
PO Box 965008  
Orlando, FL 32896-5008

SYNCB/Pep Boys  
PO Box 965008  
Orlando, FL 32896-5008

Synchrony Bank/Care Credit  
P O Box 965061  
Orlando, FL 32896-5036

Synchrony Bank/JCP  
PO BOX 960090  
Orlando, FL 32896-0090

Synchrony Bank/Lowe's  
P O Box 965007  
Orlando, FL 32896

Synchrony Bank/Walmart  
PO Box 965060  
Orlando, FL 32896-5060

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P. O. Box 232  
Mulberry, FL 33860-0232

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PO Box 5943  
Sioux Falls, SD 57117